



IDAHO DEPARTMENT OF CORRECTION

*"Protecting Idaho through Safety, Accountability, Partnerships
and Opportunities for Offender Change"*

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Governor

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Director

March 18, 2013

WC Docket No 12-375, FCC 12-167

Federal Communications Commission: Rates for Interstate Inmate Calling Services

Comment on Proposed Rule Making

The Idaho Department of Correction supports reasonable phone rates for inmate telephone calls, while asserting that prison telephone service cannot be the same as service offered in the community. Any rule passed to regulate phone call costs must take into consideration the unique nature of corrections and the important need to balance security needs and family contact.

Family Contact

The Idaho Department of Correction recognizes the value of retaining family contact during incarceration. The impact on recidivism is well-documented. Telephone service privileges are provided in every department facility and privately-run prison facilities in Idaho and contact is encouraged during face-to-face visits as well as phone calls.

Security Needs

The offender telephone system currently contracted in Idaho offers an investigative component that contributes to a successful intelligence gathering process. This service ensures the safety and security of Idaho's correctional facilities. Supporting this option is critical for the safety of staff and inmates.

Current Contract Services and Costs

Phone services in state facilities are provided through a contract that is procured following the state of Idaho's competitive bidding rules and public procurement requirements. The calling option rates are evaluated as part of the procurement process. The current phone contract offers three billing rate options.

1. The debit calling option offers the lowest cost at \$3.40 for a 30-minute call. That rate includes both interstate and intrastate calls, and is available for purchase via the commissary.
2. Intrastate calls are a flat fee rate.
3. Interstate calls are a flat fee plus a per minute charge.

Commissions are included in the contract structure. Funds received are used for the well-being of the offender population through an Inmate Management Fund. Any changes in fee structure would result in reductions in services to offenders in Idaho, with no offset funding available to replace lost commissions.

The Idaho Department of Correction requests that during the rule-making process consideration be given to balance the needs of the inmate, families and security in a manner that always factors safety into the equation. Revenue must be sufficient to provide the services required and requested, and consideration should be given to other services provided as a result of the phone contracts. In Idaho, any revenues are used for the benefit of inmates.

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